

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
Greenbelt Division**

**TRAY W. EASON**

\*

**Plaintiff,**

\*

**v.**

\*

**C.A. No.**

**AFNI, INC.; TRANS UNION LLC;  
EQUIFAX INFORMATION SERVICES,  
LLC; AND EXPERIAN INFORMATION  
SOLUTIONS, INC.,**

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**Defendants.**

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**NOTICE OF REMOVAL BY ALL DEFENDANTS**

Defendants, Trans Union LLC ("TRANS UNION"), Afni, Inc. ("AFNI"), Equifax Information Services, LLC ("EQUIFAX") and Experian Information Solutions, Inc. ("EXPERIAN") (collectively, "DEFENDANTS"), pursuant to 28 U.S.C. §§1367(a), 1441 and 1446, and LR. 103.5, file this Notice of Removal of this civil action from the Circuit Court for Calvert County, Maryland (the "State Court"), to this Court. In support hereof, DEFENDANTS state the following:

1. On or about November 30, 2007, a civil action was commenced in the State Court entitled Tray W. Eason v. AFNI, Inc., et al, Case No.: 04-07-1644-OC (the "State Court Action"), by the filing of Plaintiff's Class Action Complaint and Jury Trial Demand ("Complaint"). See, Exhibit "A." On December 11, 2007, the State Court issued a Writ of Summons ("Summons"). *Id.*

2. TRANS UNION and EXPERIAN first received the Summons and Complaint on December 18, 2007. AFNI first received the Summons and Complaint on December 21, 2007.

EQUIFAX first received the Summons and Complaint on December 27, 2007. There have been no further proceedings in the State Court Action.

3. Removal is timely because 30 days have not elapsed since any of the DEFENDANTS first received the Complaint, the initial pleading setting forth the grounds for Plaintiff's action and his claims for relief.

4. A copy of all process, pleadings and orders served upon the Defendants in the State Court Action is attached hereto as Exhibit "A."

5. The State Court Action is a civil action over which this Court has original jurisdiction under the provisions of 28 U.S.C. §1441, in that the Complaint expressly alleges violations of the Fair Credit Reporting Act, 15 U.S.C. §1681 *et seq.* (the "FCRA") and the Fair Debt Collection Practices Act, 15 U.S.C. §1692 *et seq.* (the "FDCPA"). *See* Exhibit "A."

6. Pursuant to 15 U.S.C. §1681p, 15 U.S.C. §1692k and 28 U.S.C. §1331, this Court has original jurisdiction over FCRA and FDCPA claims without regard to the amount in controversy.

7. Pursuant to 15 U.S.C. §1367(a), this Court has supplemental jurisdiction over all other claims asserted by Plaintiff. Such claims form part of the same case or controversy under Article III of the United States Constitution because they are so related to Plaintiffs' claims under the FCRA and FDCPA.

8. The State Court in which this action was commenced is within this Court's district and division.

9. Promptly after the filing of this Notice of Removal, Defendants shall provide notice of the removal to Plaintiff and to the Clerk of the Court in the State Court action, as requires by 28 U.S.C. § 1446(d).

**WHEREFORE**, DEFENDANTS pray that the above action now pending against them in the Circuit Court for Calvert County, Maryland, be removed therefrom to this Court.

Respectfully submitted by all Defendants,

/s/ Nathan D. Adler (with permission)  
Nathan D. Adler (Bar No: 22645)  
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/s/ Jeffrey Friedman (with permission)  
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*Counsel for Defendant, Afni, Inc.*

DATED: January 15, 2008

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TRAY W. EASON

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Plaintiff,

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AFNI, INC.L; TRANS UNION LLC;  
EQUIFAX INFORAMTION SERVICES,  
LLC; AND EXPERIAN INFORMATION  
SOLUTIONS, INC.

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**CERTIFICATE OF SERVICE**

H. MARK STICHEL, hereby certifies that he caused a true and correct copy of the foregoing NOTICE OF REMOVAL BY ALL DEFENDANTS to be sent on this date, *via* U.S.

Mail, postage prepaid, to the following:

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*Counsel for Plaintiff*

  
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H. MARK STICHEL

DATED: January 15, 2008